

EXHIBIT A

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Attorneys for Plaintiffs
WINGSAIL HOLDINGS, LLC and
YUNFEI “KRISTY” BAI

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

| | | |
|---|---|---------------------------------|
| WINGSAIL HOLDINGS, LLC, a Washington Corporation, and YUNFEI “KRISTY” BAI, an individual, |) | Case No.: 8:23-CV-02398-JWH-DFM |
| Plaintiffs, |) | NOTICE OF TAKING DEPOSITION |
| |) | OF DEFENDANT ANDREW |
| |) | POLSKY |
| vs. |) | Date: July 22, 2025 |
| |) | Time: 9:30 a.m. |
| ANDREW POLSKY, an individual, and SEFED, a California Corporation, and DOES 1 through 10, |) | Location: Via Remote Means |
| Defendants. |) | |

TO DEFENDANTS AND TO THEIR ATTORNEY OF RECORD IN THIS
ACTION:

YOU ARE HEREBY NOTIFIED THAT THE DEPOSITION OF Defendant
ANDREW POLSKY will be taken by remote means, commencing at 9:30 a.m.
PDT on July 22, 2025. The deposition will be recorded by stenographic and
videographic means.

YOU ARE FURTHER NOTIFIED THAT Plaintiffs reserve the right to
conduct this deposition utilizing the secure web-based video conferencing
deposition option offered by Jilio-Ryan Court Reporters, who will provide remote
access for parties participating in the deposition via the internet and/or telephone.

1 The court reporter may also be remote for the purposes of reporting the proceeding
2 and will not be in the presence of the deponent. Each and every document to be
3 produced as an exhibit will be in PDF format and produced utilizing electronic
4 equipment having the capacity to upload the documents onto the teleconferencing
5 platform. Before the deposition date, Plaintiffs will provide the necessary link to
6 the witness and parties to participate in the deposition via the internet and/or
7 telephone.

8 A list of all parties or attorneys for parties on whom this Notice of
9 Deposition is being served is shown on the accompanying Proof of Service.

10 Dated: June 13, 2025 BUUS LAW GROUP APC

11 /s/ William L. Buus

12 By: William L. Buus
13 Counsel for Plaintiffs
14 WINGSAIL HOLDINGS, LLC and
YUNFEI "KRISTY" BAI

PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of eighteen (18) years and am not a party to the within action. My business address is that of 3 Pointe Drive, Suite 110, Brea, California 92821.

On June 13, 2025, at BUUS LAW GROUP APC, 3 Pointe Drive, Suite 110, Brea, California 92821, following ordinary business practices, I served a true and correct copy of the foregoing document entitled NOTICE OF TAKING DEPOSITION OF DEFENDANT ANDREW POLSKY on interested parties in this action as follows:

Alejandro S. Angulo, Esq.
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Joelle Leib, Esq.
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Attorneys for Defendants ANDREW POLSKY and SEFED

BY EMAIL: I caused the foregoing document(s) listed above to be transmitted via email to the addressee(s) at the email address(es) listed above.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

/s/ William L. Buus